

Judge: Marc Barreca
Chapter: 11
Hearing Location: Seattle
Hearing Date: December 7, 2023
Hearing Time: 9:30 a.m.
Response Date: November 30, 2023

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In Re:

ASSET REALTY LLC

Debtor

Case No: 23-10326-MLB

DECLARATION OF GREGORY S.
WORDEN IN SUPPORT OF MOTION FOR
RELIEF FROM STAY TO USE
INSURANCE PROCEEDS TO PAY
DEFENSE COUNSEL FOR ADDITIONAL
INSURED & FOR SETTLEMENT IF
PARTIES REACH AGREEMENT

I, Gregory S. Worden hereby declare and state as follows:

1. I am over the age of 18, am making this declaration based upon my personal knowledge, and am competent to testify herein.

2. I am an attorney with Lewis Brisbois Bisgaard & Smith LLP, attorneys for General Star in this matter.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the First Amended Complaint.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the September 26-23 email from Sean Campbell to General Star.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the October 6, 2023,

DECLARATION OF GREGORY S. WORDEN IN SUPPORT OF
MOTION FOR RELIEF FROM STAY TO USE INSURANCE
PROCEEDS TO PAY DEFENSE COUNSEL FOR ADDITIONAL
INSURED & FOR SETTLEMENT IF PARTIES REACH
AGREEMENT – 1

LEWIS BRISBOIS BISGAARD & SMITH LLP
1111 Third Avenue, Suite 2700
Seattle, Washington 98101
206.436.2020

1 Reservation of Rights Letter.

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3 DATED this 13th day of November, 2023, at Tacoma, Washington.

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5 s/Gregory S. Worden

6 Gregory S. Worden
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DECLARATION OF SERVICE

I hereby declare under penalty of perjury under the laws of the State of Washington that I caused a true and correct copy of the foregoing to be served via the methods below on November 13, 2023, on the following counsel/party of record:

James E. Dickmeyer, WSBA #14318 JAMES E. DICKMEYER, PC 520 Kirkland Way, Suite 400 PO Box 2623 Kirkland, WA 98083-2623 (425) 889-2324 <i>Counsel for Debtor</i>	<input type="checkbox"/> via U.S. Mail <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input checked="" type="checkbox"/> via CM/ECF <input checked="" type="checkbox"/> via E-mail: jim@jdlaw.net
Geoffrey Groshong 600 Stewart Street, Suite 1300 Seattle, WA 98101 <i>Trustee</i>	<input type="checkbox"/> via U.S. Mail <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input checked="" type="checkbox"/> via CM/ECF <input checked="" type="checkbox"/> via E-mail: geoff@groshonglaw.com
Matthew J.P. Johnson Office of the U.S. Trustee 700 Stewart Street, Suite 5103 Seattle, WA 98101 (206) 553-2000 <i>Counsel for U.S. Trustee</i>	<input type="checkbox"/> via U.S. Mail <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input checked="" type="checkbox"/> via CM/ECF <input checked="" type="checkbox"/> via E-mail: matthew.j.johnson@usdoj.gov

DATED November 13, 2023, at Seattle, Washington.

s/Annie Kliemann

Annie Kliemann, Legal Secretary
Annie.Kliemann@lewisbrisbois.com